

REMARKS

Reconsideration of the above-identified patent application in view of the present amendment and the following remarks is respectfully requested.

It is respectfully acknowledged that claims 2-10, 17, and 18 have been indicated as being allowable if rewritten in independent form. It is also respectfully acknowledged that claims 25-32 have been indicated as being allowed.

This amendment includes a proposed drawing amendment in which it is proposed to amend Fig. 1 to delete reference number 158 and its associated lead line. The proposed drawing amendment also proposes to amend Fig. 4 to interchange reference numbers "310" and "312."

This amendment amends claims 1, 2, 18, 19, and 22. Claim 22 has been amended in the manner suggested by the Examiner to overcome the objection to the claim.

Claim 2, which was indicated as being allowable, has been rewritten in independent form. Claims 3-10, which also have been indicated as allowable, depend from claim 2. Therefore, allowance of claim 2 is respectfully requested.

Claim 18, which was indicated as being allowable, also has been rewritten in independent form. Allowance of claim 18 is respectfully requested.

Claim 1 has been amended to recite that spools of the first and second lap belt retractors align with one another on a first side of the linking mechanism to cause the first and second lap belts to extend outwardly of the first and second lap belt retractors in directions generally parallel to and

collinear to one another and toward opposite sides of the seat. This amendment of claim 1 is completely supported by the disclosure of the present application. Specifically, drawing Figs. 2, 3, and 5 illustrate that the spools of the first and second lap belt retractors align with one another on a first side of the linking mechanism to cause the first and second lap belts to extend outwardly of the first and second lap belt retractors in directions generally parallel to and collinear to one another. Figs. 1-3 and 5 and the description from page 7, line 20 to page 8, line 13 and page 9, line 10 to page 10, line 2 disclose the first and second lap belts extending outwardly of the first and second lap belt retractors toward opposite sides of the seat. Thus, the amendment to claim 1 has added no new matter.

Claim 1, as amended, patentably defines over Petri et al., U.S. Patent Application Publ. No. 2002/0109392, Coenan, U.S. Patent No. 4,147,387, and Martin et al., U.S. Patent No. 6,149,094, whether taken singularly or in combination. None of Petri et al., Coenan, and Martin et al. teaches or suggests spools of first and second lap belt retractors that are aligned with one another on a first side of a linking mechanism to cause the first and second lap belts to extend outwardly of the first and second lap belt retractors in directions generally parallel to and collinear to one another. With reference to Fig. 7 of Petri et al. the first and second lap belt retractors are not aligned with one another on a first side of the torsion spring 86. Instead, the torsion spring 86, which couples together the first and second lap

belt retractors, is interposed between the retractors. Moreover, the right and left lap belts 14 and 16 in Fig. 7 of Petri et al. are not collinear with one another. Thus, Petri et al. fails to teach or suggest the features of amended claim 1.

With reference to Coenan, none of the embodiments of Coenan teaches or suggests first and second lap belt retractors for first and second lap belts, respectively. The retractors of Coenan are associated with a three-point seat belt system having a single belt for extending across portions of an occupant of a seat. Coenan also fails to teach or suggest first and second lap belts that extend outwardly of the first and second lap belt retractors in directions collinear to one another. With reference to Figs. 8-11 of Coenan, the belts extending from the retractors are not collinear to one another.

Martin et al. also fails to teach or suggest first and second lap belt retractors having first and second lap belts, respectively. The spring motor 10 of Martin et al. is for retracting cords 26 and 28 of a Venetian blind. Thus, Martin et al. fails to teach or suggest spools of the first and second lap belt retractors that are aligned with one another on a first side of a linking mechanism to cause the first and second lap belts to extend outwardly of the first and second lap belt retractors in directions generally parallel to and collinear to one another. Martin et al. also fails to teach or suggest first and second lap belts extending outwardly of

the first and second lap belt retractors toward opposite sides of a seat.

Since none of Petri et al., Coenan, and Martin et al. teaches or suggests these features of claim 1, a combination of the references also fails to teach or suggest these features. Thus, allowance of claim 1 is respectfully requested.

Additionally, there is no motivation or suggestion in the references themselves or to one of ordinary skill in the art to combine the reference teachings of Petri et al., Coenan, and Martin et al. Specifically, Petri et al. teaches that the torsion spring 86 links the first and second lap belt retractors together so as "to equalize the retractive force exerted by the seat belt retractors on the two belt segments..." (Petri et al., paragraph 0007). One of ordinary skill in the art will recognize that none of the embodiments of Coenan has retractors that exert equal retractive forces. With specific reference to Figs. 9 and 10, which per Col. 9, lines 48-66, illustrate operation of the retractors of Fig 8, unequal amounts of seat belt webbing are stored on the drums of the retractors so that the force exerted by the lengths of webbing 41 and 52 vary from one another. Thus, one of ordinary skill in the art would not be motivated to combine the teachings of Petri et al., which attempts to equalize belt force, with the teachings of Coenan, which provides unequal belt forces. Martin et al. also fails to teach or suggest first and second lap belt retractors for exerting equal retractive force on first and second lap belts. Since there is no motivation or

suggestion in the references themselves or to one of ordinary skill in the art to combine the reference teachings of Petri et al., Coenan, and Martin et al., allowance of claim 1 is respectfully requested.

Claims 11-17 depend from claim 1 and are allowable for at least the same reasons as claim 1. Therefore, allowance of claims 11-17 is respectfully requested.

Claim 19 has been amended in a manner similar to claim 1. Claim 19, as amended, patentably defines over Petri et al., Coenan, and Martin et al. for reasons similar to those set forth above with regard to claim 1. Therefore, allowance of claim 19 is respectfully requested.

Claims 20-24 depend from claim 19 and are allowable for at least the same reasons as claim 19. Therefore, allowance of claims 20-24 is respectfully requested.

In view of the foregoing, it is respectfully submitted that the above-identified application is in condition for allowance, and allowance of the above-identified application is respectfully requested.

Please charge any deficiency or credit any overpayment in
the fees for this amendment to our Deposit Account
No. 20-0090.

Respectfully submitted,



Daniel J. Whitman
Reg. No. 43,987

TAROLLI, SUNDHEIM, COVELL,
& TUMMINO L.L.P.
526 Superior Avenue, Suite 1111
Cleveland, Ohio 44114-1400
Phone: (216) 621-2234
Fax: (216) 621-4072
Customer No.: 26,294

Proposed Amendments to the Drawings:

Attached is a copy of the drawing Figs. 1 and 4 with red ink markings showing proposed changes to the drawings in this application for which approval of the Examiner is requested.

Per the Examiner's suggestion, Fig. 1 has been amended to delete reference number 158 and its associated lead line.

Fig. 4 has been amended to interchange reference numbers "310" and "312."